12th St. files.
Note: the ground in this report is at north end of 12th St. Site, but outside of EPA Area. M. Towle

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SITE INVESTIGATION & RESTORATION BRANCH

Gilmore
& Associates, Inc.
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April 14, 2000

File No. 99-716 T

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SDMS DocID 2240049

Ms. Ann L. Breslin
Environmental Scientist
Department of Natural Resources and Environmental Control
Division of Air and Waste Management
391 Lukens Drive
Building 630, Suite 300
New Castle, DE 19720-2774

Reference: Brandywine Industrial Complex
1318 E. 12th Street
Wilmington, DE

Dear Ms. Breslin:

We are in receipt of your letter dated February 4, 2000 and the associated Brownfield Preliminary Assessment Report for the Diamond State Foundry / Pullman Palace Carworks in Wilmington, Delaware.

Based on our review of the report we recognize the following:

- The front electrical transformer area was assessed with a DNREC laboratory soil sample (SS-4). We understand that the PCB concentrations in this sample are above state standards. We further understand that DNREC is requesting "immediate remediation" as stated in the last paragraph on page 20. At this time it is our understanding that these transformers are owned and operated by the local power company. Any necessary site assessment and remediation should be directed to them.

- The rear transformer area did not apparently have any DNREC laboratory soil samples with concentrations that exceeded state PCB standards (sample SS-2 had a laboratory concentration of 500 ug/kg below the listed standards of 670,000 ug/kg and 1,300,000 ug/kg). This non-actionable DNREC PCB concentration in the rear transformer area is consistent with our independent laboratory soil sampling. Please find a summary of our laboratory soil sample results for the rear transformer area in Attachment A. As presented in Attachment A, none of our laboratory concentrations of PCBs (highest concentration 2,400 ug/kg) are above state standards. Further, please note in this Preliminary Assessment stage we did not elect to use a HSCA certified laboratory for the attached analysis.

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(610) 489-4949
Fax (610) 489-8447
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Ms. Ann L. Breslin
Environmental Scientist
Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Reference: Brandywine Industrial Complex
1318 E. 12th Street
Wilmington, DE
File No. 99-716T
April 14, 2000

As presented on the fifth full paragraph of page 20, we understand that soils from the rear transformer were determined by the DNREC mobile laboratory screening to "reveal high concentrations of PCBs". Based on our review of the report, we have not found mobile laboratory screening results above a state standard. In Appendix D of the report we have found immunoassay results for SS-1 (< 3,000 ug/kg), and SS-2 (< 4,000 ug/kg) that are below the state standards. Please provide any mobile laboratory results which indicate PCB concentrations above state standards, (670,000/1,300,000 ug/kg) or direct us to the section of the report which contains such. It is our understanding that only laboratory results (and not mobile laboratory screening) can be used to determine when actionable concentrations are present at a site. Therefore, we conclude that the rear transformer area does not require further action based on the fact that two rounds of laboratory results have determined that PCB concentrations are below the standards.

- We understand that lead concentrations were measured in soils throughout the entire region of the study area. The lead source is reportedly the result of placement of "industrial fill" and not related to operations at our clients site.

Please contact me at (610) 489-4949 if you have any questions related to this matter.

Sincerely,

(b) (4)
Manager, Geoscience Department
Gilmore & Associates, Inc.

/JC

Attachment (Laboratory Results)

cc: (b) (4) - Brandywine Industrial Complex
(b) (4) - Senior Hydrogeologist, Gilmore & Associates, Inc.

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